

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Lisa Suarez	:	Case No.: 19-17916(AMC)
	:	
Debtor	:	Chapter 13

**MOTION FOR AUTHORITY TO SELL REAL PROPERTY FREE AND CLEAR OF LIENS
AND ENCUMBRANCES**

NOW INTO COURT COMES, Lisa Suarez, hereinafter referred to as “Debtor”, and brings this Motion to Sell Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code and in support thereof avers the following:

1. Debtor commenced the instant Chapter 13 matter on December 20, 2019 by filing a Voluntary Petition.
2. The Chapter 13 Plan has not yet been confirmed.
3. The subject real property is located at 53203 Delaire Landing Road, Unit #203, Philadelphia, Pennsylvania 19114 (hereinafter referred to as “the property”) and is solely-owned by the Debtor.
4. Debtor believes it to be in her best financial interest to sell the property.
5. In furtherance of the sale, Debtor retained the services of Thomas Scott, a licensed realtor with Re/Max Realty Services-Bensalem.
6. On or about August 8, 2020, Debtor, by and through her realtor entered into an Agreement of Sale of the property in the amount of \$160,000.00. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit “A.”**
7. The settlement date for the sale of the subject property is scheduled for September 30, 2020.

8. The Buyer, Andrei Dzeshuk, is not an insider of the Debtor and the sale represents and arms-length transaction between the parties made without fraud and/or collusion.
9. From the sale proceeds, the Debtor intends to satisfy any and all liens.
10. The Debtor is desirous of receiving the total exemption in the sum of \$25,150.00 from her portion of the sale proceeds plus any sums remaining after all claims are satisfied.

WHEREFORE, Debtor, respectfully requests that the Court enter an Order: (i) Granting this Motion, (ii) Authorizing the Debtor to sell the Property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances, and, (iii) Granting the Debtor such other and further relief to which they may be justly entitled.

Dated: August 26, 2020

/s/Brad J. Sadek, Esq

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